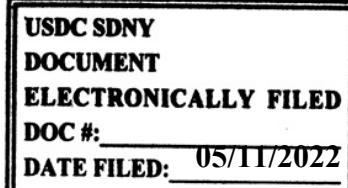




May 9, 2022



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Joint Letter Motion For
Extension of Discovery

MEMO ENDORSED

Via ECF

Hon. Katharine H. Parker
United States Magistrate Judge
United States District Court
Southern District of New York
500 Pearl Street
New York, New York 10007-1312

Re: Tricia Lewis v. CVS Albany
Docket No. : 1:21-cv-07556
Wilson Elser File No. : 23682.00001

Dear Judge Parker:

Please allow this letter to serve as a request for an extension of time to complete discovery and adjournment of the settlement conference in the above-referenced action. This request is submitted jointly with the consent of all parties. This is the first request for an extension of time to complete discovery.

According to the Case Management Order, dated December 1, 2021, the following discovery schedule was so ordered: plaintiff to provide expert reports by March 31, 2022, defendant to provide expert reports by May 13, 2022, replies to expert report by June 17, 2022, all discovery to be complete by June 17, 2022. Additionally, a settlement conference is scheduled to take place on May 16, 2022. The parties request an extension of time to complete discovery and an adjournment of the settlement conference because written discovery party-deposition, non-party witness depositions, and expert discovery remain outstanding.

Plaintiff's have provided their initial response to written discovery. Defendants are currently obtaining the relevant information and documents responsive to plaintiff's initial interrogatories and documents demands and will respond shortly.

In order to account for the necessary outstanding discovery, the parties respectfully propose a sixty day extension to each previously ordered discovery deadline, with all discovery being complete by August 17, 2022.

Finally, a settlement conference is currently scheduled to take place on May 16, 2022. When scheduling same, the parties anticipated that all party and non-party depositions would be



completed by such date. Thus, it now appears that an adjournment of the settlement conference to allow for the completion of discovery will more likely lead to a productive conference. Accordingly, the parties jointly respectfully request an adjournment of the settlement conference to take place after August 1, 2022.

There have been no prior requests for an extension of time to complete discovery. Should the Court require additional information or wish to discuss this matter further, please contact the parties.

Thank you for your time and consideration.

Respectfully submitted,

By: /s/ Mathew Ross

Matthew Ross, Esq.

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APPLICATION GRANTED: The Discovery deadline is hereby extended to August 17, 2022. The settlement conference in this matter currently scheduled for Monday, May 16, 2022 at 10:00 a.m. is rescheduled to Thursday, August 18, 2022 at 2:00 p.m. in Courtroom 17-D, United States Courthouse, 500 Pearl Street, New York, New York. Parties must attend in-person with their counsel. Corporate parties must send the person with decision making authority to settle the matter to the conference. The parties are instructed to complete the Settlement Conference Summary Report and prepare pre-conference submissions in accordance with Judge Parker's Individual Rules of Practice. Pre-conference submissions must be received by the Court no later than August 11, 2022 by 5:00 p.m.

APPLICATION GRANTED

A handwritten signature in black ink, appearing to read "Katharine H. Parker".

Hon. Katharine H. Parker, U.S.M.J.

05/11/2022